

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
AKTHAM ABUHOURLAN)	C.A. NO. 05-40127-GAO
)	
v.)	
)	
DAVID L. WINN, WARDEN)	
FMC DEVENS.)	
_____)	

UNITED STATES' MOTION TO CONTINUE
RESPONSE DATE UNTIL DECEMBER 16, 2005

The government asks the Court to continue the deadline for its response to the above-captioned §2241 petition from November 30, 2005, to December 16, 2005, for the reasons set out below:

1. It has taken longer than the government had anticipated to attempt to identify and gather information about all of the previous §2255 and §2241 petitions Abuhouran has filed and to determine what effect they have on the present petition.
2. The undersigned AUSA has a First Circuit brief due December 5, 2005 in United States v. Tahajian, 05-1676, and then will be at a Department of Justice conference in New Mexico from December 5 through December 9.
3. This is the government's first request for a continuance in this matter.

The government therefore asks the Court to continue the response date from November 30, 2005, to December 16, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Adam J. Bookbinder
Adam J. Bookbinder
Assistant U.S. Attorney

Date: November 30, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Aktham Abuhouran
Reg. No. 18938-050
F.M.C. Devens
P.O. Box 879
Ayer, MA 01432

Date: November 30, 2005

/s/ Adam Bookbinder
Adam J. Bookbinder
Assistant U.S. Attorney